

UNITED STATES DISTRICT OF NEW YORK
SOUTHERN DISTRICT OF NEW YORK

B.I.G. JEWELRY CO., L.L.C.,

Plaintiff,

-against-

TARGET CORPORATION, AMBRAS FINE
JEWELRY, INC., SAMUELS JEWELERS, INC.,
GITANJALI GEMS LTD., and JOHN DOES 1-5,

Defendants.

Case No. 07-CIV-08245 (NRB)

**NOTICE OF MOTION
TO ADMIT COUNSEL
*PRO HAC VICE***

PLEASE TAKE NOTICE that, upon the annexed Declaration of Holly A. Schrader, dated February 12, 2008, and the Certificate of Good Standing annexed thereto, Defendants Samuels Jewelers Inc. and Gitanjali Gems, Ltd. will move this Court, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District(s) of New York, for an Order allowing the admission *pro hac vice* of

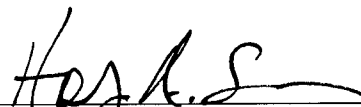
Ravi K. Sandill
Steele Sturm, P.L.L.C.
1000 Louisiana, Suite 3780
Wells Fargo Plaza
Houston, Texas 77002
(713) 659-2600
(713) 659-2601
rsandill@steelesturm.com

Ravi K. Sandill is a member in good standing of the Bar of the State of Texas. I am not aware of any pending disciplinary proceedings against Ravi K. Sandill in any State or Federal Court.

Dated: February 13, 2008
New York, New York

Respectfully Submitted,

DAVIS & GILBERT, LLP

By: 
Holly Schrader, Esq.

1740 Broadway
New York, New York 10019
Telephone: (212) 468-4800
Fax: (212) 468-4888
hschrader@dglaw.com

*Local Counsel for Defendants
Samuels Jewelers, Inc. and Gitanjali Gems, Ltd.*

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**DECLARATION OF HOLLY
SCHRADER IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

HOLLY SCHRADER, an attorney admitted to practice in the State of Texas and the State of New York, pursuant to 28 U.S.C. § 1746, hereby declares, under penalty of perjury, that the foregoing is true and correct:

1. I am an associate at the firm of Davis & Gilbert LLP. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Ravi K. Sandill as counsel *pro hac vice* to represent Defendants Samuels Jewelers, Inc. and Gatanjali Gems, Ltd. in this matter.

2. I am a member in good standing of the bar of the State of Texas and the State of New York, and was admitted to practice law in the State of Texas in 2000 and in the State of New York in 2006. I was also admitted to the bar of the United States District Court for the Southern District of New York in 2007, and am in good standing with this Court.

3. I have known Ravi K. Sandill since 2001.

4. Ravi K. Sandill is an associate at the firm of Steele Sturm, P.L.L.C. in Houston, Texas, with an office located at 1000 Louisiana, Suite 3780, Houston, Texas 77002, telephone (713) 659-2600, fax (713) 659-2601.

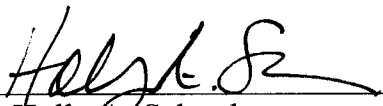
5. In compliance with Rule 1.3(c) of the Local Rule of the United States District Courts for the Southern and Eastern Districts of New York, I have attached as Exhibit A to this Declaration a Certificate of Good Standing for Mr. Sandill issued within the last thirty days by the Clerk of the Supreme Court of Texas.

6. I have found Mr. Sandill to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure. Accordingly, I am pleased to move the admission of Ravi K. Sandill, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Ravi K. Sandill, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Ravi K. Sandill, *pro hac vice*, to represent Defendant, Samuels Jewelers, Inc. and Gitanjali Gems, Ltd. in the above captioned matter, be GRANTED.

Dated: February 12, 2008
New York, New York


Holly A. Schrader

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Ravi K Sandill

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 2nd day of November, 2001.

I further certify that the records of this office show that, as of this date

Ravi K Sandill

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my hand

and the seal of the Supreme Court of
Texas at the City of Austin, this, the
4th day of February, 2008.

BLAKE HAWTHORNE, Clerk

by *Brad Sonigo*
Brad Sonigo, Deputy Clerk

No. 6991

UNITED STATES DISTRICT OF NEW YORK
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

-against-

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GITANJALI GEMS LTD., and JOHN DOES 1-5,

Defendants.

Case No. 07-CIV-08245 (NRB)

**ORDER FOR ADMISSION
PRO HAC VICE ON WRITTEN
MOTION**

Upon the motion of Defendants Samuels Jewelers, Inc. and Gatanjali Gems, Ltd.,
supported by the Declaration of its counsel, Holly Schrader, sponsor for Ravi K. Sandill

IT IS HEREBY ORDERED that:

Ravi K. Sandill
Steele Sturm, P.L.L.C.
1000 Louisiana, Suite 3780
Wells Fargo Plaza
Houston, Texas 77002
(713) 659-2600
(713) 659-2601
rsandill@steelesturm.com

is admitted to practice *pro hac vice* as counsel for Defendants, Samuels Jewelers, Inc. and Gatanjali Gems, Ltd., in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately

apply for and ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: February 13, 2008
New York, New York

United States District/Magistrate Judge

UNITED STATES DISTRICT OF NEW YORK
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

-against-

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**AFFIDAVIT OF SERVICE VIA
FIRST CLASS MAIL**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

I, Richard Gomez, being duly sworn, depose and say:

1. I am not a party to this action; I am over the age of eighteen and I am employed by Davis & Gilbert LLP, 1740 Broadway, New York, New York 10019.

2. On February 15, 2008, I served via First Class Mail the within **Notice of Motion to Admit Counsel Pro Hac Vice with Supporting Exhibits** of a true copy thereof to the address listed below:

Jonathan Andrew Berger
Levisohn, Berger & Langsam LLC
61 Broadway, 32nd Floor,
New York, NY 10006

And

Peter Berger
Levisohn Berger LLP
61 Broadway, 32nd Floor
New York, NY 10006

2. On February 19, 2008, I served via First Class Mail the within **Notice of Motion to Admit Counsel Pro Hac Vice with Supporting Exhibits** of a true copy thereof to the address listed below:

Ezra Sutton, Esq.
Ezra Sutton, P.A.
Plaza 9 Bldg., 900 U.S. Hwy, 9
Woodbridge, New Jersey 07095


Richard Gomez

Sworn to before me
This 19th day of February 2008


Notary Public

MILES BAUM
Notary Public, State of New York
No. 02BA6910086
Qualified in Nassau County
Commission Expires June 30, 2010